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19		C. N. 200 - 0201 DOC VES		
20	LA ALLIANCE FOR HUMAN RIGHTS, et al.,	Case No.: 2:20-cv-02291-DOC-KES Assigned to Judge David O. Carter		
21	Plaintiffs,			
22	VS.	JOINT STATUS REPORT		
23		Status Conference		
24	CITY OF LOS ANGELES, a municipal entity;	Date: April 23, 2020		
	COUNTY OF LOS ANGELES, a municipal	Time: 10:00 a.m.		
25	entity; and DOES 1 through 10 inclusive,	Location: 501 S. Spring St.		
26	Defendants.			
27	Defendants.			
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	1			

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	JOINT STATUS REPORT

Plaintiffs LA Alliance for Human Rights, Charles Van Scoy, Harry Tashdjian, George Frem, Leandro Suarez, Joseph Burk, Gary Whitter, Karyn Pinsky, and Charles Malow, Defendants City of Los Angeles ("City") and County of Los Angeles ("County"), and intervenors Orange County Catholic Worker, Los Angeles Catholic Worker, and Los Angeles Community Action Network (collectively, the "Parties") respectfully submit this status report in response to the Court's April 15, 2020 Amended Order, which ordered the parties to file a joint status report regarding the proposed settlement agreement to use the site at 16th and Maple as a parking area for recreational vehicles, vans, and cars being resided in by homeless persons, and specifically addressing: (a) the status of the environmental review, including any tentative findings and conclusions; and (b) any non-environmental issues remaining unresolved that pertain to the proposed settlement agreement. [Dkt. 70.]

A. The City's Plan To Shelter 100+ People At 16th And Maple

The property located at 16th and Maple is one of 10 properties owned by the State of California (or one of its agencies or departments) located in the City of Los Angeles that were identified by the State pursuant to Executive Order N-23-20 as available for use on a short-term emergency basis to provide shelter to persons experiencing homelessness. It is one of two State properties located in downtown Los Angeles, and the only one in downtown that does not have a structure on it.

Once the property was identified for possible use, the City developed a plan to place 63 shelter housing units on the property. The City began negotiating with the California Department of Transportation (Caltrans), which controls the property, to lease the property to provide emergency shelter for persons experiencing homelessness. The City purchased the first 50 shelter units from the Pallet Shelter Company to house one or two persons per unit. In addition to the 50 new housing units, the site will have bathrooms (supplemented by mobile hygiene units for showers); a facility for case

management staff to provide services; and 24-hour security. The City contracted with Volunteers of America to operate the site.

B. Environmental Issues Raised Recently By The State

On April 13, 2020, the City received a memorandum dated April 10, 2020, in which Caltrans raises potential environmental concerns related to this property. Caltrans transmitted the memorandum to the City via email at 10:00 am on April 13. Counsel for the City was unaware of this memorandum at the time it filed the City's Status Report [Dkt. 65] or appeared at the 10:00 am status conference on April 14, 2020.

In order to expedite the process to utilize the property at 16th & Maple, the City reached out to Caltrans and the Governor's Office for assistance. However, as of the date of this report, the environmental issues remain unresolved, and likely will for several weeks, meaning the site at 16th & Maple cannot be made immediately usable as contemplated by the Court.

C. The Parties Agree To Use A Different Location For Safe Parking

In light of the 16th and Maple site not being immediately available, the City proposed four possible alternative locations for safe parking for RVs and other vehicles occupied by persons experiencing homelessness: a parking lot at 749 South Los Angeles Street, a parking lot at 2245 West 8th Street; a parking lot at 1327 South Lawrence Street, and a parking lot at 323 West 87th Street.

Plaintiffs and Defendant County had no objection to any of the four proposed sites. Intervenors had no objection to the locations on Los Angeles Street and 8th Street, but object to the locations 87th Street and Lawrence Street.

D. Update On The Residents At 16th & San Julian

One of LAHSA's teams returned to visit the people residing in RVs at 16th and San Julian in downtown Los Angeles on Monday, April 20, 2020. They attempted to speak with everyone in the 16 RVs found there, but only three people answered. LAHSA provided COVID-19 flyers, face masks, waters, and snacks, and asked whether the residents were interested in a safe parking location for their RV. Only one individual said

1	he would be interested in safe parking, the other two were not interested. LAHSA will		
2	follow-up to try to contact more residents, to provide resources to help with registration		
3	for those who need it, and to continue exploring the safe parking option.		
4	Dated: April 21, 2020	MICHAEL N. FEUER, CITY ATTORNEY	
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6		By: /s/ Scott Marcus	
7		Scott Marcus Senior Assistant City Attorney	
8		Senior Assistant City Attorney Attorneys for Defendant CITY OF LOS ANGELES	
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10	Dated: April 21, 2020	MANATT, PHELPS & PHILLIPS, LLP	
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12		By: /s/ Brandon D. Young Brandon D. Young	
13		Brandon D. Young Attorneys for Defendant COUNTY OF LOS ANGELES	
14		COUNTY OF EOSTINGLEES	
15	Dated: April 21, 2020	FOLEY & LARDNER, LLP	
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17		By: /s/ Byron J. McLain	
18		Byron J. McLain Attorneys for Defendant	
19		COUNTY OF LOS ANGELES	
20	Dated: April 21, 2020	ELDER LAW AND DISABILITY LAW	
21		RIGHTS CENTER	
22			
23		By: /s/ Brooke Weitzman Brooke Weitzman	
24		Attorneys for Intervenor ORANGE COUNTY CATHOLIC WORKER	
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1	Dated: April 21, 2020	OFFICE OF CAROL SOBEL
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$		
$\begin{bmatrix} 2 \\ 3 \end{bmatrix}$		By: /s/ Carol A Sobel
$\begin{bmatrix} 3 \\ 4 \end{bmatrix}$		Carol A Sobel Attorneys for Intervenor
5		Attorneys for Intervenor ORANGE COUNTY CATHOLIC WORKER, LOS ANGELES CATHOLIC WORKER, and LOS ANGELES COMMUNITY ACTION
6		NETWORK
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8	Dated: April 21, 2020	SCHONBRUN SEPLOW HARRIS & HOFFMAN, LLP
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10		By: /s/ Catherine Sweetser Catherine Sweetser
11		Attorneys for Intervenors
12		Attorneys for Intervenors ORANGE COUNTY CATHOLIC WORKER, LOS ANGELES CATHOLIC WORKER, and LOS ANGELES COMMUNITY ACTION
13		NETWORK
14	Datada Amril 21, 2020	LECAL AID FOUNDATION OF
15	Dated: April 21, 2020	LEGAL AID FOUNDATION OF LOS ANGELES, LLP
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17		By: /s/ Shayla R. Myers Shayla R. Myers
18		Attorneys for Intervenors LOS ANGELES CATHOLIC WORKER and
19		LOS ANGELES CATHOLIC WORKER and LOS ANGELES COMMUNITY ACTION NETWORK
20		NETWORK
21	Dated: April 21, 2020	SPERTUS, LANDES & UMHOFER, LLP
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23		By: /s/ Elizabeth A. Mitchell Elizabeth A. Mitchell
24		Attorneys for Plaintiffs
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